UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	
UNITED STATES OF AMERICA,	
ONTED STATES OF AMERICA,	•

Plaintiff,

- V. -

11 CIV 9186 (RJH) ECF CASE

LEBANESE CANADIAN BANK SAL, ELLISSA

CLAIM OF INTEREST IN DEFENDANT PROPERTY: ACCOUNT 1851738532 AT COMERICA BANK IN DETROIT, MICHIGAN

HOLDING COMPANY, HASSAN AYASH EXCHANGE COMPANY, CYBAMAR SWISS GMBH, LLC, STE NOMECO SARL, STE MARCO SARL, and THE SALHAB TRAVEL AGENCY,

#### Defendants.

ALL ASSETS OF LEBANESE CANADIAN BANK SAL OR ASSETS TRACEABLE THERETO; ALL ASSETS OF ELLISSA HOLDING COMPANY; ALL ASSETS OF HASSAN AYASH EXCHANGE COMPANY; ALL ASSETS OF CYBAMAR SWISS GMBH, LLC, STE MARCO SARL, STE NOMECO SARL, AND THE SALHAB TRAVEL AGENCY, INCLUDING BUT NOT LIMITED TO ALL FUNDS ON DEPOSIT IN THE BANK ACCOUNTS AS PARTICULARLY DESCRIBED IN SCHEDULE A; and ALL ASSETS OF 30 USED CAR BUYERS IN THE UNITED STATES LISTED IN SCHEDULE A, INCLUDING BUT NOT LIMITED TO APPROXIMATELY \$248 MILLION PREVIOUSLY ON DEPOSIT AT APPROXIMATELY: 57 BANK ACCOUNTS, AS DESCRIBED IN SCHEDULE A, AND ALL PROPERTY TRACEABLE: THERETO,

#### Defendants in rem.

. - Y

COMES NOW, Global Shipping Services, Inc. (the "Claimant"), pursuant to Supp. Fed. R. Civ. P. G(5)(a), and hereby asserts a claim for itself as owner of the defendant property, account number 1851738532 at Comerica Bank in Detroit, Michigan,

as the same is proceeded against at the instance of the United States of America; and Claimant avers that it was at the time of the filing of the Complaint herein, and is now, the owner of the said defendant property and entitled to possession thereof.

WHEREFORE, it prays to defend accordingly.

Dated: January 23 2012

Respectfully Submitted,

/s/ Neil B. Mooney Neil B. Mooney, Esq. The Mooney Law Firm, LLC 1911 Capital Circle N.E. Tallahassee, FL 32308 Telephone / Fax: 850 893 0670 / 850 391 4228 E-Mail: nmooney@customscourt.com

# **VERIFICATION**

I, Ali Kain, President of Global Shipping Services, Inc., do hereby declare under penalty of perjury as provided by 28 U.S.C. § 1746, that the foregoing Claim of Interest in Property: Account Number 1851738532 at Comerica Bank in Detroit, Michigan is based on information known to me, and the facts alleged therein are true and correct to the best of my knowledge.

Executed on: Jaman 20 2012
Date

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by first class U.S. Mail and/or by using the Clerk of the Court's CM/ECF system for electronic notice on this 23th day of January, 2012 on all counsel or parties of record on the attached service list.

/s/ Neil B. Mooney
Neil B. Mooney, Esq.

# Service List

#### Clerk of Court

United States District Court- Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007-1312

Alexander Joshua Wilson, Jason Harris Cowley, Michael Dennis Lockard, Sharon Cohen Levin United States Attorney Office, SDNY One Saint Andrew's Plaza New York, NY 10007

#### Alessandra Deblasio

Deblasio & Larocca 5 Hanover Square New York, NY 10004 (212)-321-7084

Fax: (212) 689-2765

Email: adeblasio@earthlink.net

## Nabih Hussein Ayad

Nabih H. Ayad & Associates, P.C. 2200 Canton Center Road, Suite 220. Canton, MI 48187 (734) 983-0500 Fax: (734) 983-0520

Email: ayadlaw@hotmail.com

# Alex V. Hernandez

Pullman & Comley, LLC(Stamford) 4 Stamford Plaza 107 Elm Street Stamford, CT 06902-3834 (203) 674-7952 Fax: (203) 363-8659

Email: ahernandez@pullcom.com

## **Tristan Scott Cowperthwait**

Pullman & Comley, LLC (Bridgeport) 850 Main Street, 8th Floor Bridgeport, CT 06601 (203)-330-2044

Fax: (203)-576-8888

Email: tscowperthwait@pullcom.com

## Deane A. Shure

Joseph J. D'Erasmo & Associates 103 North Adams Street Rockville, MD 20850 (301) 762-8860

## Joseph John D'Erasmo

Joseph J. D'erasmo & Associates 103 North Adams Street Rockville, MD 20850 (301)-762-8865

Fax: (301)-424-7710

Email: joseph\_derasmo@yahoo.com

## **Emily Stern**

Katten Muchin Rosenman, LLP(NYC) 575 Madison Avenue New York, NY 10022 (212)-940-8800

Fax: (212)-940-8776

Email: emily.stern@kattenlaw.com

#### Scott Andrew Resnik

Katten Muchin Rosenman, LLP(NYC) 575 Madison Avenue New York, NY 10022 (212)-840-8543

Fax: (212)-894-5513

Email: scott.resnik@kattenlaw.com